1	STEVEN W. MYHRE			
2	Acting United States Attorney Nevada Bar No. 9635			
3	JARED L. GRIMMER Assistant United States Attorney			
	District of Nevada			
4	501 Las Vegas Blvd. South, Suite 1100 Las Vegas, Nevada 89101			
5	(702) 388-6336 Jared.L.Grimmer@usdoj.gov			
6				
7	Representing the United States of America			
8	UNITED STATES DISTRICT COURT			
	DISTRICT OF NEVADA -oOo-			
9	UNITED STATES OF AMERICA,	)	Case No.: 2:16-cr-00326-LRH-CWH	
10		)	Cuse 110 2.10 et 00520 Eltit C 1111	
11	Plaintiff,	)	Stipulation for Protective Order	
12	VS.	)		
13	JUSTIN DAVIS,	)		
14	Defendant.	)		
		)		
15		)		
16	IT IS HEREBY STIPULATED AND AGREED between the parties, Steven W. Myhre			
17	Acting United States Attorney for the District of Nevada, Jared L. Grimmer, Assistant United			
18	States Attorney, and Brian Pugh, Assistant Federal Public Defender, counsel for defendan			
19	JUSTIN DAVIS, that this Court issue an Order protecting from disclosure to the public any			
20	discovery documents containing the personal identifying information such as social security			
21	numbers, driver's license numbers, dates of birth, or addresses, of participants, witnesses and			
22	victims in this case. Such documents shall be referred to hereinafter as "Protected Documents."			
23	The parties stipulate as follows:			
24				

- 1. Protected Documents which will be used by the government in its case in chief include personal identifiers, including social security numbers, driver's license numbers, dates of birth, and addresses, of participants, witnesses, and victims in this case.
- 2. Discovery in this case is voluminous. Many of the documents include personal identifiers. Redacting the personal identifiers of participants, witnesses, and victims would prevent the timely disclosure of discovery to defendants.
- 3. The United States agrees to provide Protected Documents without redacting the personal identifiers of participants, witnesses, and victims.
- 4. Access to Protected Documents will be restricted to persons authorized by the Court, namely defendant, attorney(s) of record and attorneys' paralegals, investigators, experts, and secretaries employed by the attorney(s) of record and performing on behalf of defendant.
- 5. The following restrictions will be placed on defendant, defendant's attorney and the above-designated individuals unless and until further ordered by the Court. Defendant, defendant's attorney and the above-designated individuals shall not:
- a. make copies for, or allow copies of any kind to be made by any other person
   of Protected Documents;
  - b. allow any other person to read Protected Documents; and,
- c. use Protected Documents for any other purpose other than preparing to defend against the charges in the Indictment or any further indictment arising out of this case.
- 6. Defendant's attorney(s) shall inform any person to whom disclosure may be made pursuant to this order of the existence and terms of this Court's order.
- 7. The requested restrictions shall not restrict the use or introduction as evidence of discovery documents containing personal identifying information such as social security numbers, driver's license numbers, dates of birth, and addresses during the trial of this matter.

1	8. Upon conclusion of this action, defendant's attorney(s) shall return to government		
2	counsel or destroy and certify to government counsel the destruction of all discovery documents		
3	containing personal identifying information such as social security numbers, driver's license		
4	numbers, dates of birth, and addresses within a reasonable time, not to exceed thirty days after the		
5	last appeal is final.		
6	DATED this 6 <sup>th</sup> day of September 2017.		
7			
8		Respectfully Submitted,	
	For Defendant Justin Davis:	For the United States:	
9	RENE L. VALLADARES	STEVEN W. MYHRE	
10	Federal Public Defender	Acting United States Attorney	
11			
12	/s/	/s/	
	BRIAN PUGH	JARED L. GRIMMER	
13	Assistant Federal Public Defender Attorney for Justin Davis	Assistant United States Attorney	
14	Attorney for Justin Davis		
15			
16			
17	IT IS SO ORDERED:	1	
18		P 11	
19	September 8, 2017	Mrcm	
20	Date	UNITED STATES MACIS TRATE JUDGE	
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